

## **Exhibit 22**

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**From:** Quinn,Robert E

**Sent:** Tuesday, June 23, 2020 4:15 PM

**To:** 'Claudia Wilner' <[wilner@nclej.org](mailto:wilner@nclej.org)>; Chinyere Ezie <[cezie@ccrjustice.org](mailto:cezie@ccrjustice.org)>

**Cc:** Darius Charney <[dcharney@ccrjustice.org](mailto:dcharney@ccrjustice.org)>; Edward Krugman <[krugman@nclej.org](mailto:krugman@nclej.org)>

**Subject:** RE: Black Love Resists in the Rust, et al. v. City of Buffalo, et al: Plaintiff's Fourth Set of Requests for Production

For 85 and 86, I'm searching but we have raised objections relating to the Grant requests, as we've discussed, so we may have to stand on those objections if unable to resolve. I need to know more about what exists and how its searchable first.

For 87-93 I'm still searching (unfortunately we're still not back in the office) and will advise once the search is complete. Won't reiterate was I said below but its likely we'll have to discuss some of these requests more fully before anything is turned over because of search capacity, breadth, and burden issues.

Specifically, I now have a better idea of what ECAC produces and I expect to reiterate objection on burden and breadth, among other things. It's my understanding that there are several daily/weekly/monthly reports that contain a variety of information, much of it general. I'm still trying to determine how these are maintained, what exactly they contain, and what type of search is possible, so will advise once I know that.

The "directives" request is mostly just objecting to the word and asking for clarity on what you want searched, as opposed to the scope of the request its self. I am searching and if we find anything expect to be able to turn it over.

The BMHA property objection is primarily based on my understanding that we don't maintain records and information by that category and are unable to search for it.

Let me know if you have any other questions. Thanks.

Rob Quinn.

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**From:** Claudia Wilner [<mailto:wilner@nclej.org>]

**Sent:** Thursday, June 18, 2020 8:29 PM

**To:** Quinn,Robert E <[rquinn@ch.ci.buffalo.ny.us](mailto:rquinn@ch.ci.buffalo.ny.us)>; Chinyere Ezie <[cezie@ccrjustice.org](mailto:cezie@ccrjustice.org)>

**Cc:** Darius Charney <[dcharney@ccrjustice.org](mailto:dcharney@ccrjustice.org)>; Edward Krugman <[krugman@nclej.org](mailto:krugman@nclej.org)>

**Subject:** RE: Black Love Resists in the Rust, et al. v. City of Buffalo, et al: Plaintiff's Fourth Set of Requests for Production

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Rob, can you clarify for Requests 85 and 86, whether you intend to stand on your objections or whether you will be searching for and producing documents.

Similarly, for Requests 87-93 you have stated that you are not aware of any responsive documents at this time. For those requests, have you completed your search process or do you still intend to search for and produce responsive documents?

Please clarify in writing.

Thanks,  
Claudia

**Claudia Wilner**

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**From:** Quinn, Robert E <[rquinn@ch.ci.buffalo.ny.us](mailto:rquinn@ch.ci.buffalo.ny.us)>

**Sent:** Thursday, June 11, 2020 6:47 PM

**To:** Chinyere Ezie <[cezie@ccrjustice.org](mailto:cezie@ccrjustice.org)>

**Cc:** Claudia Wilner <[wilner@nclej.org](mailto:wilner@nclej.org)>; Darius Charney <[dcharney@ccrjustice.org](mailto:dcharney@ccrjustice.org)>; Edward Krugman <[krugman@nclej.org](mailto:krugman@nclej.org)>

**Subject:** RE: Black Love Resists in the Rust, et al. v. City of Buffalo, et al: Plaintiff's Fourth Set of Requests for Production

See attached Responses to your Fourth Set of Requests for Production. In addition to these responses, in an effort to move things forward, I also offer these general observations:

The demands relating to grants are the same objections we've been discussing.

The demand relating to the Erie Crime Analysis Center is broad, but I'm still looking into how much documentation would be responsive, so that is something I will follow up on. I would expect that limiting the demand would help, but want to know more about what exists before discussing that.

Demand relating to "directives" is objected to as I'm unclear what would be included in that term. If there is a specific document or form that you are referring to, please let me know. I'm still looking for potentially responsive documents on this so, if "directives" is just being used generally it would be helpful if you could define further, so I can make sure to conduct all appropriate searches.

Demand relating to stopped vehicles is broad and vague, and based on looking into prior demands I don't expect we have any compilations or capacity to search for these categories, but I'd like to do more digging before I say for sure. I will follow up on this.

Demand relating to BMHA parking lots is broad and vague in what is being requested (e.g., "citations", "concerning") so that would be something to discuss later, but I'd like to first determine if there is any ambiguity in what a BMHA parking lot is and if there's any way to determine what tickets were issued in them. I am still looking into these questions and we should discuss after I know more.

Thanks.

Rob Quinn.

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**From:** Quinn,Robert E  
**Sent:** Tuesday, May 12, 2020 8:42 PM  
**To:** 'Chinyere Ezie' <[cezie@ccrjustice.org](mailto:cezie@ccrjustice.org)>  
**Cc:** Claudia Wilner <[wilner@nclej.org](mailto:wilner@nclej.org)>; Darius Charney <[dcharney@ccrjustice.org](mailto:dcharney@ccrjustice.org)>; Edward Krugman <[krugman@nclej.org](mailto:krugman@nclej.org)>  
**Subject:** RE: Black Love Resists in the Rust, et al. v. City of Buffalo, et al: Plaintiff's Fourth Set of Requests for Production

Received. I don't like asking for extensions but we may have to in this instance given all the circumstances. I'll follow up either way. Thanks.

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**From:** Chinyere Ezie [<mailto:cezie@ccrjustice.org>]  
**Sent:** Tuesday, May 12, 2020 8:38 PM  
**To:** Quinn,Robert E <[rquinn@ch.ci.buffalo.ny.us](mailto:rquinn@ch.ci.buffalo.ny.us)>  
**Cc:** Claudia Wilner <[wilner@nclej.org](mailto:wilner@nclej.org)>; Darius Charney <[dcharney@ccrjustice.org](mailto:dcharney@ccrjustice.org)>; Edward Krugman <[krugman@nclej.org](mailto:krugman@nclej.org)>  
**Subject:** Black Love Resists in the Rust, et al. v. City of Buffalo, et al: Plaintiff's Fourth Set of Requests for Production

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Rob,

Enclosed please find copies of Plaintiffs' Fourth Set of Requests for the Production of Documents dated May 12, 2020.

Best Regards,  
Chinyere

**Chinyere Ezie**

Staff Attorney

**Center for Constitutional Rights** | Justice takes a fight.

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*Pronouns: She/Her*

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